



MANAGING PARTNERS
Phillip C. Hamilton, Esq.
Lance A. Clarke, Esq.

1/13/2021

The appointment is approved.
SO ORDERED.

To: Honorable Judge Paul A. Crotty
United States District Court
Southern District of New York

Re: Miguel Angel Gonzalez
United States v. Miguel Angel Gonzalez 20 Cr. 507 (PAC)

Dear Judge Crotty,

On July 30, 2020 I was appointed to represent Miguel Angel Gonzalez under the Criminal Justice Act, **18 U.S.C. §3006A** ("CJA"). I write to request the appointment of Stacey J. Clarke as a paralegal to assist with Mr. Gonzalez's matter. I respectfully suggest that appointment a paralegal would represent a cost saving measure to the Court and a time saving measure for counsel.

Discovery in Mr. Gonzalez's matter is voluminous entailing multiple surveillance videos, photos, calls, text messages, multiple search warrant returns, as well as forensic reports from cellphones recovered.

Ms. Stacey Clarke has over 7 years' experience as a bilingual legal assistant. Ms. Clarke has researched and prepared documents for litigation, appeared on behalf of corporations in Administrative matters, reviewed, translated, and prepared court documents as well as assisted in the preparation of correspondence between attorneys and the Courts. Ms. Clarke has assisted defense counsel and other attorneys on numerous cases in the past by converting, reviewing, and organizing discovery to prepare for Counsel. Ms. Clarke is fluent in Spanish and has assisted counsel in translating court documents as well as assisting in proffer prep with Spanish speaking clients. Ms. Clarke has also been the liaison between defense counsel and law enforcement agencies, attorneys, and medical providers for the purpose of obtaining case-related information.

In, *United States v. Johnny Beltre*, 3:16CR42 (VLB) Ms. Clarke organized the discovery essential to Mr. Beltre, translated the documents into Spanish and assisted Counsel in reviewing the documents with Mr. Beltre's family who predominately spoke Spanish. In *United States v Mario Acosta*, 1:17-CR-00712 (AJN), Ms. Clarke assisted with communicating with Mr. Acosta's family as well as organizing and reviewing discovery with Mr. Acosta's family.

Ms. Clarke has currently been assisting defense counsel in *United States v Alexandru Iordache*, 1:19-CR-00651 (LTS) in reviewing and organizing over 40 TB of discovery as well as *United States v Darrius Sutton*, 1:20-cr-00323 (AMD) with reviewing audio phone calls and video surveillance to identify segments of relevancy to categorized for client given the limited amount of time BOP inmates have to review discovery.

A copy of Ms. Clarke's CV is attached to this letter for the Court's consideration. If the Court is



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inclined to grant this request, I respectfully request that Ms. Clarke be appointed at the paralegal rate of \$90 per hour for up to 70 hours given her ability to both assist defense counsel in reviewing and organizing discovery for review with Mr. Gonzalez at an economical rate.

Thank you in advance,

Lance A. Clarke

Lance A. Clarke

Stacey J. ClarkeTel: (347) 339-9053 – Email: SC@HamiltonClarkeLLP.com**PROFESSIONAL EXPERIENCE:****Hamilton Clarke, LLP**

New York, NY

04/20-Present

Paralegal/ Translator

- Review, translate and organize discovery
- Assist in the preparation of various court documents.
- Attend meetings and assist attorney with preparation of clients for meetings with the government and law enforcement

Richman Property Services

New York, NY

09/18-4/20

Assistant property Manager/Legal Assistant

- Prepare documents in preparation of litigation
- Ensuring compliance with Housing regulations
- Ensuring building is up to code, and repairs are swiftly and properly accomplished.
- Review and assess documentation necessary for compliance with HDC.
- Schedule the showing of vacant units.

Bernstein Clarke & Moskovitz, PLLC

New York, NY

9/16-4/20

Contract Paralegal

- Review, translate and prioritize discovery for lead attorney
- Assist in the preparation of various court documents
- Attend meetings and assist attorney with preparation of clients for meetings with the government and law enforcement

Goldberg Weprin Finkel Goldstein LLP

New York, NY

06/16- 09/18

Legal Assistant to Partner

- Prepared and reviewed documents for pending legal matters
- Assisted lead attorney in ascertaining and organizing requested documents
- Translated and prepared documents for Spanish speaking clients
- Conducted research regarding Property data using Property Shark, NYC department of Finance, ACRIS

Kinsey Equities LLC

New York, NY

07/15-04/16

Administrative Legal Assistant

- Liaison to inhouse counsel regarding landlord/tenant issues
- Organized and prepared payments for property fees and taxes.
- Located and notified delinquent accounts and arranged debt repayment schedules

K. Huang Realty Corp

New York, NY

09/13- 07/15

Paralegal/Assistant Property Manager

- Organized and prepared documents to assist attorney during Housing Court matters.
- Appeared and represented corporation in Administrative Court to dispute violations against the Environmental control board, Department of buildings, Division of Housing and Community renewal, and Housing court.
- Created invoices, reports, memos, letters, finance statements and all other documents.
- Calculated and prepared payments property taxes, fees and expenses.

Arbor Education and Training

New York, NY

10/11- 05/12

Business Relations Specialist

- Created and executed marketing plans to prospective employers.
- Sourced and canvased local neighborhoods for employment opportunities for agency's client base.
- Carefully pre-screened clients and conduct interviews training to better prepare them for employment.
- Coordinated job fairs on-site which include workshops, introductions, interviews, and networking.
- Created and managed all reporting for our recruiters, which included detailed descriptions of each of the agency's clients and transactions.

EDUCATION:

The City College of New York Paralegal Certificate	New York, NY	Est. 06/2021
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Licensed NY Real Estate agent/	New York, NY	12/2021
Notary Public	New York, NY	06/2022
Property Manager Certificate	NYC/HPD	06/2015

SKILLS: Bi-lingual (English/ Spanish) Proficient in MS Office, Adobe Acrobat and legal research